

3/16/2017 Call with GHD on the RI/FS workplan comments

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CH2M

Focus on the field investigation

Comment #20. They were going to look more specifically at the parcels in the OU1 boundary to understand site conditions before stepping out. They wanted to phase it after. There is a cost implication. The workplan didn't specify those parcels in terms of looking at outlying areas, but that would be the plan. They can expand on what is in the workplan to make it clear, and extend to the DQOs.

Comment #21. Additional analytes. Screening, sequencing of additional sampling, do total chrome first. The dioxin/furan analysis is the most costly. The screening method they were looking at was not going to be appropriate. Another idea is to focus on areas where that type of waste disposal occurred, sequencing and phasing the work to look at those areas first? Needs additional discussion in the next week or so, sensitivity.

Comment #23. Where are we headed to with the data? Risk and contamination. We're not requiring to sample near foreign objects, we want good coverage. High res sonar techniques? Might be adequate to get an image of what it is. ODNR identified some cars in its sonar study, but a number of objects are not determined. From a remedy standpoint, access control might be the way to address human health risk, but wouldn't address eco. We'll table the issue pending discussion on the PRPs side.

Comment #24. Floodplain. They agree about looking at the topography. They have a topographic map from an aerial topographic survey they did a few years ago. They compared it to the figure showing sampling locations. There is a low spot aligned with where they have the locations in the workplan. In the field they would make sure they sample in the low part of the topography. There is an existing storm sewer outfall just adjacent to the south side of the quarry pond from ERR, that flows into a low-lying area, not directly into the river. They are going to look at the low area as where the contaminants might accumulate.

Comment #25. We can do a phased approach and use the lines of evidence from the floodplain to the river, but the groundwater pathway to the river. The concern is, they go collect data, it will be difficult to tie it to any one source. There could be a background sample upstream that is lower. The concern is that they would be responsible for cleaning up all the other industrial sources in the area. It's a watershed issue.

Comment #27, etc., groundwater contamination. Why not start looking at the area now. That is in line with their thinking. Comment #58, sample for all the parameters. We would need to have some follow-up discussions to help define this,

Comment #63 – PCB method. They are in the process of looking at that, it takes some time to go through the information already collected to evaluate for the NDs.

Last item – schedule for revision of the workplan. Could they get an additional 30 days.